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11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 NICHOLAS SNIDER and LAUREN
15 SNIDER, Individually and as Special
16 Administrators of the ESTATE OF ISAIAH
17 SHARP, Deceased,

18 Plaintiffs,

19 v.

20 STATE OF NEVADA, on relation of the
21 NEVADA DEPARTMENT OF
22 CORRECTIONS; CHARLES DANIELS,
23 individually and as Director of the Department
24 of Corrections; WILLIAM QUENGA,
25 individually and as Deputy Director of the
Department of Corrections; BRIAN
WILLIAMS, individually and as Deputy
Director of Operations of the Department of
Corrections; JAMES JONES, individually and
as Inspector General of the Department of
Corrections; WILLIAM GITTERE,
individually and as Deputy Director of
Programs of the Department of Corrections;
CALVIN JOHNSON, individually and as
Warden at High Desert State Prison; JEREMY
BEAN, individually and as Associate Warden
at High Desert State Prison; FRANK
DREESEN, individually and as Associate
Warden at High Desert State Prison; GARY
PICCININI, individually and as Associate
Warden at High Desert State Prison;
RONALD OLIVER, individually and as
Associate Warden at High Desert State Prison;
DOE OFFENDER MANAGEMENT
ADMINISTRATOR (DOE OMA); DOES
I-X, inclusive; BLACK AND WHITE
COMPANIES I-X, inclusive; ABC
CORPORATIONS, I-X, inclusive

26 Defendants.
27
28 _____ /

Case No. 2:22-cv-01723-RFB-VCF

STIPULATION TO AMEND DISCOVERY
PLAN AND SCHEDULING ORDER
SUBMITTED IN COMPLIANCE WITH
LR IA 6-1 and LR26-3 (SECOND
REQUEST)

The parties hereto, by and through their respective undersigned counsel, in compliance with the Court's Scheduling Order hereby files this Stipulation to extend discovery dates.

The parties have been diligent in conducting discovery. Since the first request to extend discovery several more depositions have been taken which have resulted in additional depositions needing to be taken, including depositions of witnesses who have needed Subpoenaed. Once such witness that is important to the case has moved since the last known address was given by Defendants to Plaintiffs. Plaintiff is being diligent in tracking this witness and still is in the process of trying to locate the witness. Additionally, four other depositions are being conducted this week that the parties will need time to the transcripts for their experts. Both sides have served written discovery upon the parties. The current deadline for the Expert disclosure is December 7, 2023 and the parties feel that more time is needed for the additional depositions to be taken and probable additional written discovery.

DISCOVERY PLAN & SCHEDULING ORDER

Plaintiffs and Defendants hereby agree and stipulate as to the following discovery plan:

1. **DISCOVERY CUT-OFF DATE.** The new Discovery Cut-off date shall be 120 days from the current discovery cut-off of February 5, 2024 which shall be (**May 6, 2024**).
 2. **LAST DAY TO AMEND PLEADING AND/OR ADD PARTIES.** The last day to amend pleading and/or add parties will be (90) days prior to the Discovery Cut-off date which shall be (**February 6, 2024**).
 3. **LAST DAY TO EXTEND DISCOVERY.** The last date to request an extension for the discovery in this matter will be (20) days prior set for the Discovery Cut-off in this matter (**April 16, 2024**).
 4. **DISCLOSURE OF EXPERTS.** The last day for disclosing experts will be sixty (60) days before the close of discovery (**March 7, 2024**).
 5. **INTERIM STATUS REPORT.** Pursuant to Local Rule 26-3, an Interim Status Report shall be filed no later than sixty (60) days prior to the discovery cut-off date (**March 7, 2024**).
 6. **REBUTTAL EXPERTS.** The last day for disclosing rebuttal experts shall be thirty-

1 two (32) days before the close of discovery (**Monday, April 8, 2024**).

2 7. **DISPOSITIVE MOTIONS.** The last date for filing dispositive motions shall be no
3 later than thirty-two (32) days before the close of discovery (**Monday, April 8, 2024**).

4 8. **PRE-TRIAL ORDER.** The Joint Pre-trial Order shall be filed no later than thiry-two
5 (32) days after the deadline for dispositive motions (**April 8, 2024**).

6 9. **F.R.C.P. 26(A)(3) DISCLOSURES.** The disclosures required by F.R.C.P. 26(a)(3)
7 and any objections thereto shall be included in the Pre-trial Order.

8 Dated this 8th day of November 2023.

9 BRADLEY, DRENDEL & JEANNEY

Dated this 8th day of November 2023.

AARON D. FORD
Attorney General

11 /s/ Leah Ronhaar
12 Leah Ronhaar, Esq.
Attorney for Plaintiffs

11 /s/ Douglas Rands
12 Douglas R. Rands, Esq.
Bar No. 3572
Senior Deputy Attorney General
Attorneys for Defendants

18 IT IS SO ORDERED.



21 Cam Ferenbach
United States Magistrate Judge
22 11-9-2023
23 DATED _____

Reva Archer

From: Douglas R. Rands <DRands@ag.nv.gov>
Sent: Wednesday, November 8, 2023 2:20 PM
To: Reva Archer; Leah Ronhaar; Roberta W. Bibee
Cc: Kurt Gruner
Subject: Re: Sharp v. NDOC

You may use my e-signature on this

Doug

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From: Reva Archer <reva@bdjlaw.com>
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To: Douglas R. Rands <DRands@ag.nv.gov>; Leah Ronhaar <Leah@bdjlaw.com>; Roberta W. Bibee <rbibee@ag.nv.gov>
Cc: Kurt Gruner <kgruner@bdjlaw.com>
Subject: RE: Sharp v. NDOC

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Attached for your review and signature is the Stipulation to Extend Deadlines (second request).

Thank you.

Reva S. Archer

**Paralegal to Leah Ronhaar, Esq.
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To: Leah Ronhaar <Leah@bdjlaw.com>; Roberta W. Bibee <rbibee@ag.nv.gov>
Cc: Reva Archer <rev@bdjlaw.com>; Kurt Gruner <kgruner@bdjlaw.com>
Subject: RE: Sharp v. NDOC

No, not at all. Put one together for the time you need, and I will sign.

Doug

Douglas R Rands

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Cc: Reva Archer <rev@bdjlaw.com>; Kurt Gruner <kgruner@bdjlaw.com>
Subject: Sharp v. NDOC

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Doug and Roberta,

We are running out of time to get some of these depositions done. I honestly think we need more time for discovery and therefore expert deadlines. Do you have any objection to a stipulation?

Leah Ronhaar, Esq.
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